

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

RASHEED CARRASQUILLO, on behalf of himself and all others similarly situated,

Civil Action No. 1:24-cv-1008

Plaintiffs,

v.

SECURITAS SECURITY SERVICES USA, INC.,

Defendant.

**JOINT MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT AND  
DISMISSAL WITH PREJUDICE**

Plaintiff Rasheed Carasquillo (“Plaintiff”) and Defendant Securitas Security Services USA, Inc. (“Defendant”) (collectively, the “Parties”), hereby jointly and respectfully move the Court for approval of the Parties’ proposed settlement of the above-captioned action, the terms of which are set forth in the Settlement and Release Agreement (“Settlement Agreement”), attached as Exhibit A to the accompanying Memorandum of Law, and to dismiss the action in its entirety with prejudice, which includes Plaintiff’s claims under the Fair Labor Standards Act (“FLSA”) and the North Carolina Wage and Hour Act (“NCWHA”). For the reasons stated in the Memorandum of Law, the settlement of this action is a fair and reasonable resolution of a *bona fide* FLSA dispute.

**WHEREFORE**, the Parties hereby request that the Court grant this Motion and enter the proposed Order approving the Settlement and Release Agreement and dismissing the above-captioned action in its entirety with prejudice.

Respectfully submitted this April 22, 2025.

/s/ Gilda Adriana Hernandez

Gilda A. Hernandez (NCSB No. 36812)  
Hannah B. Simmons (NCSB No. 59579)  
Matthew Marlowe (NCSB No. 60035)  
Briahna B. Koegel (NCSB No. 62491)  
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*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 22, 2025, I electronically filed the foregoing Joint Motion to Approve Settlement Agreement and Dismiss with Prejudice with accompanying Memorandum of Law, Exhibits, and Proposed Order with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants:

Gilda A. Hernandez (NCSB No. 36812)  
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Matthew S. Marlowe (NCSB No. 60035)  
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Respectfully submitted,

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